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**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT**

I, Michaela Gneco, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Secret Service and have been since October 2017. I received formal training at the Federal Law Enforcement Training Center in Glynco, Georgia, and the James J. Rowley Training Center for the U.S. Secret Service in Beltsville, Maryland. Training included, among other things, the investigation of financial crimes that included the following: identity theft, access device fraud, bank fraud, forgery and counterfeit U.S. currency. I am currently assigned to the Boston Field Office. My current assignment includes investigating violations of Title 18, United States Code, Sections 1028, 1028A, 1029, 1037, 1341, 1343, 1344, 1349, and 1956. Based on my training and experience, I am familiar with the means by which individuals use computers and information networks to commit various offenses, including financial and computer crimes.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of federal law including Conspiracy to Commit Wire Fraud, 18 U.S.C. § 1349, Wire Fraud, 18 U.S.C. § 1343, Aggravated Identity Theft, 18 U.S.C. § 1028A have been committed, are being committed, and will be committed by at least three individuals: a Hispanic male known

variously as “Samuel MACHUCA,” “Ithier Batista Rodriguez”, and “Angel Garcia Sanchez,” along with Luiyi Taveras GARCIA, Abel Bier ROMERO, and others known and unknown.

AUTHORIZATION REQUESTED

4. This affidavit is being filed with the Court in support of criminal complaints charging “Samuel MACHUCA,” AKA “Ithier Batista Rodriguez” AKA “Angel Garcia Sanchez,” Luiyi Taveras GARCIA, Abel Bier ROMERO. In connection with the criminal complaints, I am further requesting this Court issue warrants for the arrest of those individuals.

PROBABLE CAUSE

Summary of the Investigation

5. On November 4, 2020, Home Depot Loss Prevention Investigator Emily DeMelo contacted Smithfield Police Sergeant Jay Corser regarding an apparent credit card scheme targeting Home Depot. Sgt. Corser is a federal task force officer (TFO) with the United States Secret Service. Investigator DeMelo advised TFO Corser that she has learned of a scheme nearly identical to that of an earlier series of incidents targeting Home Depot investigated by the Secret Service. In 2018, Sgt. Corser and agents of the United States Secret Service had investigated a group committing a series of credit card frauds at Home Depot locations. That investigation led to the arrest of several individuals for Access Device Fraud, 18 U.S.C. § 1029, and Aggravated Identity Theft, 18 U.S.C. §1028A. Investigator DeMelo had assisted investigators during that case and was familiar with the patterns used by organized groups to fraudulently obtain merchandise from Home Depot using stolen credit cards numbers and stolen personally identifying information. According to DeMelo, the new group of suspects were using Home Depot business charge accounts held by various businesses. The men were ordering assorted merchandise including building materials and

paying for the items using Home Depot “Pro” account numbers. According to Investigator DeMelo, she has learned that Citibank, the financial institution that extends the credit and manages the accounts for Home Depot cards, had reported a series of charge backs. Charge backs are instances where a customer receives a bill and refutes the transaction.

6. Based upon my review of the Home Depot records provided, police reports and conversations with investigators, I have learned that since November 2020, several individuals have been fraudulently making purchases at area Home Depot stores using unauthorized Home Depot store credit cards. Typically, the scheme is being carried out as follows: The Home Depot customer service desk or “Pro desk” receives a call requesting a pick-up order be prepared. The caller provides a list of materials and quantities desired. The “customer” then provides a name, credit card number, security code, and phone number for the store to call when the order is ready. The Home Depot employees then use the name and phone number provided to link the order to an existing Home Depot Pro account. The caller provides the Home Depot employees with a credit card number and security code to complete the purchase. When the pick-up order is ready, the Home Depot employee calls the number provided and notifies the “customer” that the order is ready. After Home Depot makes the notification, two or three individuals arrive at the store to pick up the order at either the Home Depot Pro Desk or the customer service desk.

7. On some occasions, an individual assembled an order in-person with a Home Depot employee for later pick up. The involved subject provided the Home Depot employee with a phone number to contact for payment details.

Regarding RI Tag PA-997

8. On Friday, November 6, 2020, Investigator DeMelo called Sgt. Corser and advised him that the same suspects that had been involved with the recent credit card fraud

incidents (charge backs) at the Smithfield store were again at the Smithfield store attempting to purchase building materials. I am aware that Investigator DeMelo had reviewed surveillance images of several of the involved charge back transactions and was familiar with the appearance of the involved suspects. Investigator DeMelo told Sgt. Corser that her sales associate had denied this transaction. She reported that the suspects had left the area in a white dump truck bearing RI passenger registration PA-997. Sgt. Corser conducted a registration check which revealed the plate had expired in August 2020 and was supposed to be displayed on a 2007 Dodge Caliber registered to Yunion Llano Toribio, DOB 5/5/97. Toribio had addresses listed at 37 Magdalene Street, Providence, and 440 Park Avenue, Cranston.

9. On Friday, November 20, 2020. Sgt. Corser received an email from Investigator DeMelo that listed two account numbers for Home Depot credit cards that she had determined to be cards opened using fraudulent information. Investigator DeMelo also provided two digital receipts showing all transactions from these two fraudulent accounts that totaled over \$126,000. The sales occurred between 9/20/20 and 11/11/20. These transactions occurred at Home Depot Stores located in Massachusetts, Rhode Island, and New Hampshire. The purchases typically were between \$3,000 and \$5,000. Several of the transactions were conducted by a group of individuals unidentified at the time, operating a white dump truck displaying Rhode Island passenger plate PA-977.

10. On December 1, 2020, a Massachusetts State Trooper stopped a white Ford dump truck displaying a Rhode Island passenger plate, PA-977 on Interstate 90 in Weston, Massachusetts. The truck was operated by Adelso Gutierrez. The truck was carrying sheet rock. Gutierrez reported that the truck belonged to Yunion Toribio who was doing business as

LTG Friends Construction of 37 Magdalene Street Providence, Rhode Island. The truck was unregistered.

11. Sgt. Corser and I have reviewed various reports accessed through the Rhode Island cross-agency reporting system, Rhode Island Law Enforcement Telecommunications system and reports provided by the Massachusetts State Police Commercial Enforcement Unit related to Rhode Island passenger registration PA-997. Those inquiries have revealed that the plate has been observed by Rhode Island State Police on November 11, 2020 on a white Ford work van bearing the words "LTG Friends Construction" parked in the area of 440 Park Avenue, Cranston, Rhode Island. The van has reportedly displayed the phone numbers 401-601-0294 and 401-523-4287 on the rear door panels. Members of the investigative team have conducted physical surveillance of both the Magdalene Street and Park Avenue addresses. Both the white dump truck and the white van have been observed parked in front of or in the vicinity of 440 Park Avenue in Cranston, Rhode Island.

12. I have researched 440 Park Avenue Cranston, Rhode Island and I have learned this address is currently owned by a Hector Santana. According to public tax records, the residence was sold to Santana by Lesli Construction LLC in February of 2020. Lesli Construction LLC was registered with the Rhode Island Secretary of State before its corporate charter was revoked on June 3, 2020. The public record lists an address of 194 Eastwood Avenue, Providence, Rhode Island. The agent and manager are both listed as Lesli Llano.

13. On Thursday, November 26, 2020 at approximately 8:40 am, Sgt. Corser drove past 440 Park Avenue, Cranston and observed a work van with RI reg. PA-997 displayed on the rear door. The vehicle had signs on it for "LTG Friends Construction" displayed on the

sides and rear of the van. Sgt. Corser took digital photos of the vehicle and the registration plate PA-997 attached to the van.

14. Investigators have inquired into public records databases including the Rhode Island Secretary of State Corporations Division, the Massachusetts Secretary of State Corporations Division and the Rhode Island Department of Business Regulation, Contractors Registration Board. Members of the prosecution team have also conducted an internet browser inquiry using the search term LTG Friends Construction. I have learned that LTG Construction is listed with the Rhode Island Contractor's Registration Board. The owner is listed as Lesli Llano. LTG Friends Construction is registered with the Massachusetts Secretary of State. The public record lists an address of 20 Main Street, Apartment 2, Milford, Massachusetts. The agent and officer for the corporation is Luiyi A. Taveras GARCIA. LTG Friends Construction was cited by the Occupational Health and Safety Administration (OSHA) on March 13, 2019 for safety related offenses at a building site in Rhode Island. OSHA cited LTG Friends Construction on August 26, 2019 for safety violations at a building site in Hyannis, Massachusetts.

15. On April 9, 2021, Investigator DeMelo notified the USSS that earlier in the day a suspicious order had been placed and was scheduled for pickup later in the day. The U.S. Secret Service established a physical surveillance at 1100 Newport Avenue South Attleboro, Massachusetts, the Home Depot where the materials were to be picked up. Investigator DeMelo reported that an unknown individual had placed an order (number H2659-172305) totaling \$2,605.93. The caller told Home Depot the order would be picked up during the day. At or around 1554 hours, USSS agents observed a white Ford dump truck with Rhode Island tag 41617 arriving at the Home Depot location. Based in part on an arrest report provided to investigators

by the Johnston Police Department¹, and Home Depot's asset protection specialist, DeMelo, agents were able to identify the individual operating the truck as "Angel Garcia SANCHEZ" (aka "Ithier Rodriguez" aka Samuel MACHUCA²). Investigators observed MACHUCA as he entered the store with an unidentified male while talking on his cell phone. MACHUCA later exited the store while talking on his cell phone and drove away in the white dump truck without any Home Depot materials loaded in the vehicle. I conducted an inquiry into the registration plate displayed on the white Ford dump truck and learned that the plate was registered to Jose A. Serrano Narragansett Street Cranston, Rhode Island. Registry of Motor Vehicles records reflect the vehicle was registered March 5, 2021. The Registry of Motor Vehicle's lists a vehicle identification number different from that listed on the Ford dump truck stopped by the Massachusetts State Police.

16. According to information provided by Investigator Demelo, due to the credit card information having been "flagged" as fraudulently obtained, the order had been cancelled by Home Depot employees prior to MACHUCA's arrival. The name and phone number provided for the order was S.R.³ and xxx-xxx-2674. The card number provided was xxxx-xxxx-xxxx-0009. Law enforcement database searches conducted confirmed that the suspects submitted S.R.'s PII and that S.R. is an actual individual who lives in the state of Massachusetts.

¹ MACHUCA was arrested as "Ithier Batista Rodriguez" by Johnston Police Department on March 8, 2021, as discussed later in this affidavit.

² The names "Sanchez" and "Rodriguez", among others, were discovered by law enforcement to be aliases for a Samuel MACHUCA, as discussed further in this affidavit.

³ Law enforcement later discovered that S.R. is a victim's true name, as discussed further in paragraph 16 of this affidavit.

17. On April 15, 2021, I spoke with S.R. over the phone and asked if he had previously or recently been a victim of identity theft or credit card fraud. S.R. stated that on April 6, 2021 at approximately 1630 hours, he received a call that appeared to come from his own cell phone number. Upon answering the call, he stated that a male with a mild Spanish accent on the other end identified himself as from “Verizon,” and asked if S.R. was attempting to ship a package to an individual in Jacksonville, Florida. S.R. stated that he was not, the male proceeded to inform S.R. that his account had been compromised somehow, and that the call would be connected to the fraud department at “Verizon”. S.R. stated to me that throughout the duration of the 45-minute phone call, he was placed on hold several times and that the male on the line continued to say that his “computer was frozen” and that he would “get his supervisor to send [S.R.] a code to protect you.” S.R. stated that during the phone call, he received three text messages containing “codes,” which he provided so that the purported employee on the phone could “verify” S.R.’s identity.

18. S.R. stated that after speaking with TFO Corser who had originally contacted S.R. on or around April 12, 2021 regarding the compromise of his information, S.R. attempted to call Citi Bank to access his current account and was told that there was an additional credit card opened in his name. S.R. was told that it was being closed at that time, due to the reports of fraudulent transactions. S.R. provided me with screenshots of the text messages for review. The first text message was sent at 1659 hours and stated, “Citi Identification Code Service 27175977 Reply HELP for help STOP to cancel. Msg&Data rates may apply”. The second text message was sent at 1701 hours and stated, “Click [https://crs.registtermmycc\[dot\]com/t/oMYhMADM](https://crs.registtermmycc[dot]com/t/oMYhMADM) to access your new Home Depot Consumer Credit Card. Reply STOP to cancel. Msg & Data Rates May Apply.” The third text message was sent at 1719 hours and stated, “ID Code: 33979 To

complete credit app. We wont contact you for the code. Call 888-908-0031 if you didn't request it (TTY 888-824-2323)."

19. On April 27, 2021, Investigator DeMelo informed investigators that Samuel MACHUCA aka "Angel Garcia SANCHEZ" aka "Ithier Rodriguez" had been in the Home Depot located in South Attleboro, Massachusetts. Investigator DeMelo reported that MACHUCA assembled an order of materials (order number H2659-174249) to pick up at a later time. Investigator DeMelo stated the order was placed using a Home Depot credit card ending in 9871. The name provided was "Angel Garcia Sanchez" of "angel carpentry." The would-be buyer provided phone number 774-707-7518. The order consisted of roofing materials and shingles and totaled \$4,945.18. The "Angel Garcia Sanchez" Home Depot Pro account had been activated on April 21, 2021. The applicant provided an address of 133 Pine St, Attleboro, MA 02703, and email address of elviajero0326@gmail.com.

20. On April 29, 2021, USSS agents surveilled the Home Depot located at 1100 Newport Avenue in South Attleboro, Massachusetts. At approximately 0946 hours, Investigator DeMelo informed me that she would be making a phone call to Samuel MACHUCA aka "Angel Garcia Sanchez" to remind him that order H2659-174249 was ready for pick up. Investigator DeMelo consented to the phone call being recorded. DeMelo has, on several separate occasions, spoken with MACHUCA in person at various Home Depot locations due to the nature of her position, as well as over the phone, calling MACHUCA via 774-707-7518 to communicate order pick-ups. Investigator DeMelo called the phone number provided for the order and a male voice answered the call. At the conclusion of the call, DeMelo positively identified the voice on the other end of the line as Samuel MACHUCA.

21. On April 29, 2021, at approximately 10:19am, USSS agents observed a white Ford dump truck bearing the Rhode Island tag 41617 arrive at the Home Depot. The dump truck was accompanied by a silver blue Honda Odyssey displaying Rhode Island registration OC-268. Samuel MACHUCA was identified by USSS agents as the operator of the Honda Odyssey. He was wearing a neon green vest with the words "Loyalty Roofing Solutions" and the phone number "508-733-0837" on the back. MACHUCA and an unidentified male operating the white Ford Dump Truck were observed entering the Home Depot on foot via the Pro entrance. Around the time of their arrival, Investigator DeMelo contacted me stating that a third male identified as Luiyi Taveras GARCIA had also arrived at the store location and interacted with MACHUCA and the unidentified male inside the store. I am aware that Luiyi Taveras GARCIA is the president and agent of LTG Friends Construction. The order was loaded into the white Ford dump truck by Home Depot employees, under the direction of MACHUCA. MACHUCA, Luiyi Taveras GARCIA, and the unidentified male then left the parking lot. At approximately 11:25am, USSS agents observed both vehicles arrive at the residence of 126 Bracken Street in Cranston, Rhode Island, where the materials were unloaded into a detached, multi-car garage at the back of the property. I am aware that 126 Bracken Street Cranston, Rhode Island is a three-family residence, currently owned by Ana Fernandez.

22. I reviewed the records provided by Home Depot regarding the above order and learned that eight orders were made, utilizing the same name, phone number, and email address as the above-described order. Each order was paid for utilizing a different Home Depot store credit cards.

Luiyi Taveras GARCIA

23. Luiyi Taveras GARCIA, DOB XX/XX/1987 is a citizen of the Dominican Republic and is known by law enforcement to reside at 440 Park Avenue, in Cranston, Rhode Island. Law enforcement database searches of Luiyi Taveras GARCIA have revealed previous charges of possession to distribute a Class A drug, controlled substance conspiracy, manufacturing, possession, and delivering cocaine, and breaking and entering of a residence and unlicensed operation of a motor vehicle. GARCIA appears to operate the business “LTG Friends Construction” with Lesli Llano from 440 Park Avenue Cranston. Law enforcement surveillance has established this address is a residence. Investigators have observed multiple work vehicles parked in and around the residence bearing signs stating “LTG Friends Construction” along with GARCIA’s and Llano’s phone numbers listed. Luiyi Taveras GARCIA has been observed by Investigator DeMelo and Home Depot surveillance footage later reviewed by me and TFO Corser on multiple occasions involved in the pick-up, delivery, and unloading of the fraudulently obtained construction materials from Home Depot, as discussed later in this affidavit.

Abel Bier ROMERO

24. I have queried Rhode Island passenger registration plate, OC-268. Rhode Island Registry of Motor Vehicles reports that the plate belongs on a 2006 Honda Odyssey registered to Abel Bier ROMERO, DOB XX/XX/1993. I have learned that ROMERO is a citizen of the Dominican Republic. He lists his residential address as 575 Dyer Ave, E-111 in Cranston, Rhode Island. Law enforcement database searches of ROMERO have revealed previous charges of speeding, shoplifting, conspiracy to commit a crime outside of Rhode Island, manufacturing, possession, and delivering a schedule I/II controlled substance, and obstructing an officer in the execution of duty. Abel Bier ROMERO has been observed by Investigator DeMelo and Home

Depot surveillance footage later reviewed by me and TFO Corser as involved in the pick-up, delivery, and unloading of the fraudulently obtained construction materials from Home Depot. Investigators have noted that the blue Honda Odyssey with Rhode Island tag OC-268 has been operated by MACHUCA on numerous occasions.

Samuel MACHUCA

25. Samuel MACHUCA, DOB XX/XX/1967 is a citizen of the Dominican Republic and is known to law enforcement by a number of aliases. Most recently, MACHUCA has used the names “Ithier Rodriguez”, “Ithier Batista”, and “Angel Garcia Sanchez” in his interactions with law enforcement, financial institutions, and area stores and has provided driver’s licenses and other forms of identification supporting his various aliases. Law enforcement database searches of MACHUCA have revealed previous charges, to include trafficking cocaine, possession to distribute a Class B drug, among other charges. Law enforcement database searches also reveal that MACHUCA entered the United States on March 3, 2000. MACHUCA has provided several addresses as residences for his respective aliases and has been observed by law enforcement to be residing at 149-151 Althea Street in Providence, RI.

26. On December 26, 2020, TextNow provided records responsive to a grand jury subpoena the U.S. Secret Service served upon them, seeking records related to the phone numbers provided to Home Depot to conduct the fraudulent payment transactions. Those records included multiple calls to phone number 857-419-9056. The U.S. Secret Service then served a subpoena upon T-Mobile for the subscriber information of phone number ending in 9056 and the records revealed the subscriber as Ithier Batista, with an address of 193 Night Ave in Attleboro, MA. Sgt. Corser then conducted an inquiry into Ithier Batista. On March 9, 2021, Sgt. Corser queried the Rhode Island Cross-Agency records system and learned that Batista’s full

provided name was Ithier Batista Rodriguez, and that the Johnston Police had arrested Batista Rodriguez the previous day. Sgt. Corser secured a copy of the Johnston Police report concerning this arrest. Sgt. Corser learned that the arrest related to a shoplifting allegation made by the Home Depot in Johnston. Sgt. Corser secured a copy of Home Depot's internal report concerning the incident.

27. Sgt. Corser obtained surveillance footage and still photos of "Batista Rodriguez" recorded during the attempted shoplifting incident and immediately recognized "Batista Rodriguez" as an individual I had seen on numerous surveillance recordings provided by Home Depot related to fraudulent transactions linked to the group. Sgt. Corser noted that Batista Rodriguez" was wearing the same dark blue baseball hat, bandana, and Adidas sneakers that he wore in several of the earlier videos.

28. On March 10, 2021, Smithfield Police dispatch ran a criminal history check of Ithier Batista Rodriguez. That check revealed that Ithier Batista had numerous law enforcement contacts. During those contacts Ithier Batista provided numerous aliases. The inquiry revealed that there were multiple active outstanding warrants for Ithier Batista under aliases. Batista Rodriguez provided fictitious information to police during processing and fingerprinting. All arrests were linked by fingerprint submissions to the FBI when "Batista Rodriguez" was processed through AFIS, showing "Ithier Batista Rodriguez" was the same individual as Samuel MACHUCA, DOB 5/7/67, along with numerous aliases including Andres Cabrera, Jose Deleon, Juan Pacheco, Jorge Quinones, Carlos Rodriguez, John Rodriguez, and Andre Torres.

29. As described above, the police report provided by Johnston Police Department, states that on March 8, 2021, the Johnston Police responded to Home Depot in their town for a report of a shoplifting. The police located and charged "Ithier Batista Rodriguez." According to

the report and a review of Home Depot surveillance footage, MACHUCA “Ithier Batista Rodriguez” arrived at the Home Depot location operating a Blue Honda Odyssey with Rhode Island tag OC-268. Luiyi Taveras GARCIA also arrived operating a white Ford dump truck with a magnetic sign on the driver’s side door bearing the words “PAPOLO” on the side with an indiscernible phone number printed below. GARCIA proceeded to load up the white dump truck with an order later identified by Home Depot as purchased with a fraudulently obtained Home Depot store credit card. GARCIA went back into the store. The asset protection specialist on-scene then observed MACHUCA and GARCIA load up siding materials into a cart. A short time later, MACHUCA was seen walking past the point of purchase with the siding materials without making any attempt to legitimately purchase them. The asset protection specialist confronted MACHUCA in front of the store, and after a brief conversation, the stolen items were recovered and MACHUCA began running away from the store. Johnston officers responded to the Home Depot and while searching the vicinity, apprehend MACHUCA. According to the Police report MACHUCA stated, “Please don’t arrest me, I left the stuff outside the store.” Home Depot’s asset protection specialist positively identified him as the suspect who had attempted to leave the store with building materials. MACHUCA was subsequently charged with Shoplifting and was issued a no trespass notice from the Home Depot in Johnston, Rhode Island.

30. As referenced above, TFO Corser and I were able to identify a number of MACHUCA’s aliases, to include “Ithier Rodriguez”, and “Ithier Batista”, among others. According to law enforcement observation, surveillance video and photos provided by Home Depot, MACHUCA has driven a large U-Haul on a number of occasions to Home Depot to pick up large quantities of fraudulently obtained building materials and supplies. U-Haul was able to provide TFO Corser and myself with records regarding the observed U-Haul rentals on June 4,

2021. On such occasions, MACHUCA has provided U-Haul with a Rhode Island state driver's license, as well as payment information in the name of a "Ithier Rodriguez". Furthermore, Ithier Rodriguez provided U-Haul with a telephone number of 857-419-9056. During his March 2021 arrest by the Johnston Police, Ithier Rodriguez provided his telephone number as 857-419-9056. I caused a subpoena to be served upon T-Mobile for records related to this number. T-Mobile records received responsive to the subpoena list the subscriber of that number as Ithier Batista 193 Night Street Attleboro, Massachusetts. Records obtained via subpoena from T-Mobile for the Target Telephone number list the subscriber as Ashley Mendoza 193 Night Street Attleboro, Massachusetts.

31. MACHUCA has also used the alias "Angel Garcia Sanchez" when placing orders at Home Depot using fraudulently obtained store credit cards. MACHUCA has a Massachusetts state driver's license in the name of "Garcia." I have served grand jury subpoenas upon several financial institutions seeking account records in the name Garcia-Sanchez. Based upon my review of those records I have learned that Garcia-Sanchez has used the Massachusetts driver's license to open several bank accounts including accounts at Navigant Credit Union, Wells Fargo Bank, TD Bank, JP Morgan Chase Bank, utilizing the name Garcia-Sanchez and the same driver's license containing the same personal information. A review of those bank records has revealed that suspected fraudulent unemployment payments have been routed into several of those accounts. Based upon my conversations with Home Depot Loss Prevention and my review of records, I know that MACHUCA has also utilized the name Angel Garcia Sanchez to place orders at Home Depot. On those occasions he has provided the phone number of 774-707-7518 and an email address of elviajero0326@gmail.com.

Additional Activity relating to MACHUCA, GARCIA, and ROMERO

32. On October 20, 2020, a transaction identified by Investigator DeMelo as fraudulent occurred at approximately 8:53pm in the Home Depot store located in Smithfield, RI. The order (number H4282-101586) was placed under the name "Cristian Castro", with a provided phone number of 413-400-9577 and email address of ramirezinversiones25@yopmail.com. The order consisted of various plumbing and building materials, to include cabinets, multiple light fixtures, smoke alarms, and more, totaling \$3,730.84, paid for utilizing Home Depot store credit card ending in 3995. I reviewed the video surveillance footage provided by Home Depot and observed Samuel MACHUCA and Abel Bier ROMERO standing at the cashier while the order was being processed.

33. According to records provided by TextNow, the phone number of 413-400-9577 was subscribed to the TextNow username "ramirezinversiones25" from October 20, 2020 at 5:56pm to November 10, 2020. The account was registered on the same day, using the email address ramirezinversiones25@yopmail.com. The call records provided indicate that on October 20, 2020 at 8:55pm, a call was placed from the Smithfield store phone number of 401-233-4204 to the TextNow subscriber that lasted 154 seconds.

34. I caused a subpoena to be served to Citibank for the Home Depot store credit card ending in 3995. A review of the records revealed that the credit card was registered to N.L. of Waterloo, NY. On September 29, 2020, two calls were made to Citibank by a Spanish-speaking male claiming to be N.L. First, inquiring as to what phone number was linked to the account, and secondly to gain the ability to access the account and receive a new credit card for the account ending in 3995. On October 25, 2020, the legitimate N.L. spoke with Citibank representatives who communicated that his card "was not cancelled properly". N.L. stated that he had been

working with someone from Home Depot regarding the fraudulent transactions and wished to proceed with the closing of his card.

35. On October 27, 2020, a fraudulent transaction occurred in the Home Depot store located in Natick, MA. The order (H2669-213824) totaling \$3,393.67 was placed under the name "Juan Ramirez", with a provided phone number of 978-447-9934, utilizing Home Depot store credit card ending in 7126. The email address provided for the Home Depot Pro account was ramirezinversiones4@yopmail.com. I reviewed the video surveillance footage provided by Home Depot and observed the white Ford dump truck with RI tag PA-997 belonging to LTG Friends Construction parked in the Contractor pick-up area with Gutierrez and three unidentified males conducting the transaction. I observed a Home Depot employee on the phone at the register with Gutierrez and an unidentified male, and later observed the loading the materials into the vehicle with the assistance of a few Home Depot employees.

36. According to records provided by TextNow, the phone number 978-447-9934 was subscribed to username "ramirezinversiones4" from October 27 to November 21, 2020. The call records provided indicate that on October 27, 2020 at 10:13am, a message was received from 401-601-0294⁴. At 10:14am, a call was made to 401-601-0294. At 11:57am, a call was received from the Natick Home Depot Store phone number and lasted for 205 seconds. Based on the time that Gutierrez and the unidentified men were in the Home Depot store, as well as the footage provided by Home Depot, I have been able to conclude that it was during this phone call that the fraudulent credit card number and payment information was likely communicated from an

⁴ The phone number 401-601-0294 was discussed earlier in this affidavit where it was identified as a listed number for LTG Friends Construction.

unidentified individual, to the Home Depot employee at the register. Further, the use of the LTG telephone number further implicates GARCIA in the overall conspiracy.

37. According to records provided by Citi Bank, the card ending in 7126 belonged to a victim identified as O.B. from Ohio. On October 27, 2020, O.C. spoke with Citi Bank representatives and identified the above-described Home Depot purchase as fraudulent and unauthorized.

38. On December 8, 2020, USSS agents conducted a surveillance of 440 Park Ave in Cranston, RI and the white Ford dump truck originally bearing RI tag PA-997 and identified as belonging to LTG Friends Construction. USSS agents observed the target vehicle parked in the vicinity of 440 Park Ave, with a temporary Texas tag, as well as a white Chevy van with RI tag PA-997, and a black GMC pickup truck with an LTG Friends Construction sign on the back. At approximately 3:15pm, the white Ford dump truck with three occupants was observed by agents arriving at the Home Depot location in Mansfield, MA. Three Hispanic men were observed gathering fencing materials and speaking on the phone and via video chat to show an unidentified individual the products being purchased. At approximately 5:30pm, the three men left the Mansfield Home Depot location with the white Ford dump truck and traveled to the vicinity of 16 Oakcrest Drive in North Providence, RI. USSS agents observed the black GMC pickup truck parked on the street in the vicinity of the residence. The white Ford dump truck was observed leaving the vicinity without the fencing supplies from Home Depot, and arriving shortly thereafter at 23 Massie Ave in Providence, RI, where the vehicle was parked and the occupants entered a black SUV operated by an unidentified individual and drove away.

39. I received the records of the fraudulent transaction from Home Depot. The order (number H2609-121613) totaling \$3,340.39 was placed under the name "Miguel Ramirez" with

the provided phone number of 978-719-7853 and email address of ramirezinversiones22@yopmail.com and was paid for using Home Depot store credit card ending in 0591. I reviewed the records provided by TextNow for the phone number ending in 7853 and learned that it was subscribed to the username "ramirezinversiones22" from December 7, 2020 to January 1, 2021. At 3:46pm and 3:48pm, two phone calls were placed to this number from the Mansfield Home Depot store phone number 508-337-2050 that lasted nine seconds each. At 3:49pm, the phone number 401-678-2102⁵ called this phone number as well. Beginning at 3:50pm, four more phone calls were placed to this number from the Mansfield Home Depot store phone number.

40. According to records provided by Citi Bank, the card ending in 0591 belonged to a victim identified as J.C. of South Park, PA. On December 9, 2020, J.C. flagged the Mansfield Home Depot transaction as fraudulent, and Citi Bank listed his card as "lost/stolen", and reissued J.C. a new credit card.

41. According to records provided by U-Haul, on December 15, 2020 at approximately 11:12 am, a 15' moving van with a ID number of "DC 3126 F" on the side corner was rented by an Abel Bier ROMERO from U-Haul's 464 Broad Street location in Providence, RI. The phone number 401-678-2102 was provided.

42. Later that day, Investigator DeMelo identified a fraudulent transaction. The transaction occurred at approximately 2:53pm in the Home Depot store located in Norwood, MA. The order (number H2681-144345) was placed under the name "Jose Garcia" with a phone number of 978-586-2718 and email address of ramirezinversiones17@yopmail.com. The order

⁵ As discussed in paragraph 69 of this affidavit, based on this investigation I have come to learn that ROMERO has regularly stated his phone number as 401-678-2102 to include instances of renting U-Haul vehicles.

consisted of 72 bundles of Pewter Gray roofing shingles and three 1 1/2 inch roofing coil, totaling \$2,034.39 and was paid for utilizing Home Depot store credit card ending in 7351.

43. I reviewed the video surveillance footage provided by Home Depot relating to order H2681-144345 and observed the U-Haul truck with ID "DC 3126 F" on the side corner, parked in the Contractor pick-up area with one male in the driver's seat. I observed an unidentified male and a male identified by law enforcement as Darien Felix wearing a black sweatshirt with the letters "NBA" on the front, at the cashier's desk, with the first male standing with a cell phone in his hand as the Home Depot cashier appeared to call a phone number utilizing the store phone. The two individuals are then seen exiting the store carrying materials, while the unidentified driver re-positions the U-Haul van for a Home Depot employee to load the shingles into the back.

44. According to the U-Haul rental contract, the van with ID "DC 3126 F" was returned the next day on December 16, at 8:35am, to the U-Haul located at 464 Broad Street in Providence, RI. The contract states that the van had traveled approximately 138 miles for the duration of the rental period.

45. According to records provided by TextNow, the phone number of 978-586-2718 was subscribed to the username "ramirezinversiones17" from December 7, 2020 to January 1, 2021. The account had been registered using the email address ramirezinversiones17@yopmail.com. The call records provided indicate that on December 15, 2020 at 2:53pm, a call was placed from the Norwood store phone number of 781-762-9270 to the TextNow subscriber that lasted 287 seconds.

46. On January 9, 2021, at approximately 1:51pm, a 15' U-Haul moving van with an ID number of "DC 1024 D" on the side corner was rented by an Abel Bier ROMERO from the location on 464 Broad St, in Providence, RI. The phone number 401-678-2102 was provided.

47. Later that day, Investigator DeMelo identified a fraudulent transaction that had occurred at approximately 6:09pm in the Home Depot store located in Johnston, RI. The order was made in person utilizing a physical credit card ending in 4865 and totaled \$2,894.14. I reviewed the video surveillance footage provided by Home Depot and observed a U-Haul moving van parked in the Contractor pick-up area, and ROMERO leaving the driver's seat. I also observed an unidentified male in the store with building materials at the check-out with MACHUCA, as MACHUCA manipulated his cell phone until an image appeared which he zoomed in on before walking away from the cashier's counter. MACHUCA re-enters the video peripheral shortly thereafter and showed the photo to the Home Depot employee at the register. A few minutes later, MACHUCA is seen using a physical Home Depot store credit card at the payment terminal. I observed MACHUCA and the unidentified male approach the U-Haul parked outside, and ROMERO exiting the driver's side of the van.

48. Investigator DeMelo alerted the USSS that she had discovered yet another fraudulent transaction using the same card ending in 4865. This transaction occurred on January 11, 2021, at approximately 11:03am in the Home Depot Store located in Johnston, RI. The order totaling \$972.68 and paid for using card ending in 4865 consisted of insulation, doors, and plumbing materials. I reviewed the Home Depot video surveillance footage and observed MACHUCA, as well as GARCIA wearing an LTG Friends Construction shirt, loading up the materials onto carts. I also observed GARCIA stand at the register with MACHUCA as

MACHUCA conducted the transaction. I am aware and have confirmed with Citi Bank that credit card ending in 4865 was closed by Citi Bank for fraud in January of 2021.

49. Investigator DeMelo has alerted the USSS to yet another fraudulent transaction involving the suspects. This transaction occurred on June 11, 2021, at approximately 7:54pm at the Home Depot located in South Attleboro. The order was made in person and was paid for utilizing Home Depot store credit card ending in 4329. I reviewed the video surveillance footage provided by Home Depot and observed MACHUCA along with two unidentified males in a truck with the partial logo of "Adiel Cleaning" visible in the video frame. I am aware that credit card ending in 4329 was closed by Citi Bank for fraud in July of 2021.

50. I have inquired into public records databases including the Rhode Island Secretary of State Corporations Division. I have learned that Adiel Cleaning and Car Wash LLC was registered on February 25, 2021 with the resident agent, manager, and authorized signer listed as Abel Bier ROMERO. The address of its principal office is listed as 23 Massie Ave in Providence, RI.

51. On June 11, 2021, U.S. Magistrate Judge Sullivan signed a GPS tracking warrant and a Pen Register Trap and Trace Order which were served to T-Mobile for phone number 774-707-7518. On June 17, 2021 at approximately 11:50am, I received GPS coordinates indicating that the target phone was within 16 meters of the U-Haul location located at 464 Broad Street, in Providence, RI.

52. On July 30, 2021, TFO Corser contacted U-Haul and requested records relating to rentals originating from the 464 Broad Street location on June 17, 2021. In response to that request, the investigative team received records related to the rental of a 20' moving van with the identifying number TT8138E. The vehicle was rented by Ithier Batista aka "MACHUCA.

“MACHUCA” provided U-Haul a telephone number of (857) 205-1613 and an email address of mjack8573@gmail.com. The records reflect the vehicle was rented to MACHUCA from 11:56 a.m. to 7:00 p.m. The email address mjack8573@gmail.com has been used in furtherance of two fraudulent transactions at Home Depot since January 2021 through May 13, 2021.

53. On June 17, 2021 at approximately 12:50pm, I received GPS coordinates indicating that the target phone was within 46 meters of the Home Depot located in Taunton, MA. I contacted Investigator DeMelo, who informed me that she was able to see MACHUCA with a U-Haul truck on the store premises, picking up an order. The order (number H2677-98822) was placed under the name "Dennis Bynum", with a provided phone number of 978-533-5510⁶. The order was paid for using card ending in 4622 and consisted of roofing materials and 72 bundles of Timberline HDZ Pewter Gray shingles. I reviewed the video surveillance footage provided by Home Depot and observed MACHUCA wearing a neon green vest with the words “Loyalty Roofing Solutions” on the back, conducting the transaction and directing the Home Depot employees assisting to load the three pallets of roofing shingles into the back of the open U-Haul truck with the assistance of the Home Depot employees. I am aware that the credit card ending in 4622 was closed by Citi Bank for fraud in July of 2021.

54. At approximately 1:37pm and 2:21pm, two outgoing calls were made to the phone number 401-867-0535⁷. At approximately 2:35pm, I received GPS coordinates indicating that the target phone was within 21 meters of 126 Bracken Street, in Cranston, RI⁸.

⁶ According to records provided by TextNow, the phone number 978-533-5510 was subscribed to username "dennis2142" from May 12 to June 2, 2020

⁷ The phone number 401-867-0535 is a MetroPCS tracphone that has been active since September 25, 2019. This phone number, along with Juan Noboa, an individual with which this phone number is associated, will be discussed later in this affidavit.

55. At approximately 4:35pm, I received GPS coordinates indicating that the target phone was within 28 meters of the Home Depot located in West Roxbury, MA. With the assistance of Investigator DeMelo, I learned that a suspicious order (number H2677-98822) was placed under the name “Hector Cancell” with a provided phone number of 508-644-0944. The order consisted of roofing shingles and other building materials, totaling \$4,909.71, paid for utilizing Home Depot store credit card ending in 4622. I reviewed the video surveillance footage provided by Home Depot and observed MACHUCA with a neon green vest with the words “Loyalty Roofing Solutions” on the back, entering the store. I also observed a U-Haul van parked by the loading dock entrance, and MACHUCA approaching it to direct the Home Depot employees to load four pallets of roofing shingles into the back. At one point, it appeared as if MACHUCA was talking with someone via video chat on his phone while waiting for the U-Haul to be filled. As previously stated in this affidavit, I am aware that credit card ending in 4622 was closed by Citi Bank for fraud in July of 2021.

56. At approximately 7:24pm, two incoming calls were made from phone number 401-867-0535 that lasted three seconds and one minute, forty-five seconds, respectively. At approximately 7:55pm, four calls were made to and from phone number 401-678-2102. At 7:58pm, one incoming call was made from 401-867-0535 that lasted fifty-seven (57) seconds. At 8:00pm and 8:02pm, two calls were made to and from phone number 401-678-2102 that lasted nineteen seconds and fifty-seven (57) seconds, respectively. At 8:05pm and 8:07pm, two calls

⁸ MACHUCA and others have been observed at this residence previously by agents dropping off materials picked up from Home Depot.

were made to and from phone number 401-867-0535 that lasted fifteen and nineteen seconds, respectively.

57. At approximately 8:05pm, I received GPS coordinates indicating that the target phone was within 28 meters of 126 Bracken Street, in Cranston, RI. At approximately 9:05pm and 9:20pm, I received GPS coordinates indicating that the target phone was within 21 and 18 meters, respectively, of 23 Massie Street, in Providence, RI⁹.

58. At 8:14pm and 8:15pm, two outgoing calls were made to 401-867-0535 that lasted thirty-one seconds, and one minute, and forty-eight seconds, respectively. This telephone number is listed to a MetroPCS prepaid Tracphone but has been provided by Juan NOBOA to the Cranston Police as a contact telephone number for NOBOA.

59. On June 17, 2021 at approximately 9:35pm, I received GPS coordinates indicating that the target phone was within 21 meters of the Althea Street and Cranston Street intersection in Providence, RI. As discussed above, law enforcement has observed a vehicle regularly operated by MACHUCA at 149-151 Althea Street, which I believe to be the residence of MACHUCA.

60. At 9:51pm, one incoming phone call was made from 401-867-0535 that lasted forty-seven seconds. Which I have concluded establishes additional contact between MACHUCA and NOBOA.

61. Investigators queried Rhode Island's Cross Agency Contact Check, and the Rhode Island's Business Corporation Database and learned that Juan Noboa (DOB XX/XX/1973) lists his residential address as 126 Bracken Street in Cranston, Rhode Island. Law enforcement

⁹ ROMERO and others have been observed at this residence previously by law enforcement.

database searches of Noboa have revealed previous charges of felony assault, manufacturing, possession, and delivering a schedule V substance, and resisting arrest. On June 11, 2019 and October 14, 2020, Cranston PD reported contact with Noboa, listing his provided phone number as 401-867-0535. I caused a subpoena to be served to MetroPCS for the phone number 401-867-0535. I learned that there was no subscriber name provided, and that the phone number is a tracphone that has been active since September 25, 2019.

62. On June 21, 2021 at approximately 10:59am, I drove past 126 Bracken Street in Cranston, RI, and took photos of the residence including the detached, multi-car garage. I observed the garage door not fully closed, with stacks of roofing shingles on the ground inside. I provided a photo to Investigator DeMelo for product verification, who confirmed that the roofing shingles inside the garage were from The Home Depot.

63. On June 22, 2021, a surveillance was conducted in the area of Althea Street and Cranston Street in Providence, RI. I observed a silver-blue Honda Odyssey with RI tag OC-268 parked in the driveway of 149-151 Althea Street. This vehicle has been observed by law enforcement and Home Depot video surveillance footage as being operated by MACHUCA on numerous occasions and is registered to ROMERO as discussed earlier in this affidavit.

64. On July 28, 2021, TFO Corser drove past 126 Bracken Street in Cranston, RI and took a photo of the residence, including the detached, multi-car garage. He observed the garage door fully open, with a large stack of roofing shingles on the ground inside.

GARCIA's Home Depot Pro Account

65. On June 24, 2021, I received records relating to GARCIA's Home Depot Pro account from Home Depot. GARCIA's account spans from September of 2019 to September of 2020, with each purchase conducted utilizing Home Depot Store credit card ending in 3661. The

Home Depot customer profile is under the name of “Luiyi Taveras”, with a listed address of 440 Park Ave in Cranston, RI. The provided email address is abelbier@gmail.com and the provided phone numbers are 401-601-0294 (primary) and 917-558-4346 (secondary).

66. I caused a subpoena to be served to Google regarding the abelbier@gmail.com account. I reviewed the records and learned that the email account was created on June 6, 2013 under the name “abel moises bier romero”. The recovery phone number provided is 917-558-4346, and the recovery email is bierabel@gmail.com.

67. GARCIA’s last recorded Home Depot purchase using his own Home Depot account was conducted on September 14, 2020, totaling \$17.69, paid for utilizing a debit card ending in 3991. This Visa debit card was used consistently for all fifty of the transactions conducted under this account. The earliest fraudulent transaction identified by Home Depot occurred on September 14, 2020 at approximately 6:24pm. The order (number H4282-99263) totaling \$4,657.89, was placed under the name “Randy Ramirez” with a provided phone number of 413-323-3224 and email address of fast79-mgar@yahoo.com. The order was paid for utilizing Home Depot credit card ending in 8793. On October 11, 2021, MACHUCA is captured by Home Depot video surveillance footage with a white dump truck similar to the one associated with LTG Friends Construction, picking up two orders in Worchester, MA and Bellingham, MA placed utilizing the same credit card ending in 8793.

68. I reviewed the Citibank records relating to Home Depot store credit card ending in 8793 and found that the card was registered to a legitimate victim out of Delaware referred to as J.F. On October 20, 2020, J.F. spoke with CitiBank representatives regarding an unauthorized purchase, stating that they hadn’t used their card in “about a year” and that none of the transactions that were being charged to the card were authorized.

69. I conducted an open source social media search and discovered GARCIA's LTG Friends Construction Facebook page. The page was created on June 18, 2018 and provides a contact phone number of 401-601-0294 and email address of luiyiltgfriendsconstruction@gmail.com. I have found that despite GARCIA's above-described Home Depot Pro account inactivity since September 14, 2020, LTG Friends Construction has published posts from September 29, 2020 to April 22, 2021, indicating active construction activity. On December 24, 2020, the LTG Construction page posted five photos location tagged in Providence, Rhode Island. The photos showed three men working on a roof of a private residence, yellow in color. One of the photos depict several bundles of roofing shingles with the words "GAF TimberlineHDZ High Definition Weath Wood" on them.

70. Prior to this Facebook post, on December 18, 2020 at approximately 11:15am, a fraudulent transaction occurred at the Home Depot located in Brockton, MA. The order (number H2611-74377) was placed under the name "Jose Ramirez", with a provided phone number of 978-786-4331 and email address of ramirezinversiones14@yopmail.com. The order consisted of 57 bundles of Timberline HDZ Weathered Wood Algae Resistant Laminated High Definition Singles, and other roofing materials, totaling \$2,006.18, paid for utilizing Home Depot store credit card ending in 0937. I reviewed the video surveillance footage provided by Home Depot and observed ROMERO along with an unidentified man in the store facilitating the transaction and picking up the roofing materials. The video surveillance footage further captures the materials being loaded into a white dump truck that ROMERO is seen later away from the store. I am aware that Home Depot store credit card ending in 0937 was closed for fraudulent activity on or around December 18, 2020, after the card holder verified to CitiBank employees that the recent purchases at Home Depot were not authorized.

Activity relating to 401-678-2102

71. During the course of this investigation, I have found that on numerous occasions, the phone number 401-678-2102 has been provided by ROMERO and in conjunction with records relating to ROMERO. As detailed in the paragraphs above, ROMERO has provided U-Haul with the phone number 401-678-2102 on his rental contracts. In records provided by TextNow, eight different phone numbers that have been used as contact numbers that I have linked to fraudulent Home Depot purchases that have either contacted or have been contacted by the phone number associated with ROMERO, 401-678-2102. These TextNow numbers are linked to approximately \$124,418.71 in identified loss thus far.

Regarding the GPS Tracking Warrant and Pen Register Trap and Trace Order

72. I reviewed the results of the PRTT order on MACHUCA's phone number 774-707-7518 and learned that from June 13 to August 3, 2021, MACHUCA has been in contact or contacted by ROMERO one hundred and sixty-nine (169) times, GARCIA one hundred and ten (110) times, and Noboa sixty-two (62) times.

73. Of the over \$600,000 in fraudulent transactions identified in this scheme to date, approximately \$56,000 have been identified thus far as placed with MACHUCA's aliases and the phone number 774-707-7518. An additional \$47,900 of the fraudulent orders identified have been placed with various other names and contact information but have been picked up by MACHUCA with others.

74. I reviewed the TextNow records of the phone numbers used to place the fraudulent orders with Home Depot and learned that three different TextNow phone numbers¹⁰

¹⁰ These phone numbers are 978-607-1839, 978-364-9283, and 978-447-9934.

either contacted or have been contacted by the phone number associated with LTG Friends Construction, 401-601-0294. These phone numbers are used consistently in conjunction with three different email addresses¹¹. Based upon my review of records supplied by Home Depot, I have linked, these TextNow numbers and email addresses to approximately \$57,671.66 in identified loss. Of these orders linked by TextNow numbers and email addresses, 13 different victim Home Depot store credit card numbers were used, with video surveillance footage capturing MACHUCA picking up and facilitating transactions on October 11, 2020 in Bellingham, MA, November 24, 2020 in Johnston, RI, December 3, 2020 in Worcester, MA, and December 16, 2020 in Waltham, MA. In relation to the above orders, Home Depot video surveillance footage has also captured GARCIA picking up building materials on January 20, 2021 in Johnston, RI, as well as the LTG Friends Construction white dump truck being utilized to pick up orders on October 27, 2020 (discussed in paragraph 33 of this affidavit) in Natick, MA, and on November 2, 2020 in Auburn, MA.

75. Based on my training and experience and the facts of the investigation, there is probable cause to believe that MACHUCA, GARCIA, and ROMERO are actively engaged in a conspiracy to commit wire fraud as well as other federal crimes. GARCIA and ROMERO have both leveraged vehicles associated with his name or his businesses in furtherance of the crime. MACHUCA and ROMERO have both rented U-Haul vehicles in furtherance of the crime, with MACHUCA providing false identification to do so, and have facilitated on multiple occasions the pick-up of the fraudulently obtained building materials. MACHUCA has also provided a phone number and email address associated with one of his aliases on multiple occasions.

¹¹ These email addresses are ramirezinversiones4@yopmail.com, ramirezinversiones5@yopmail.com, and ramirezinversiones7@yopmail.com.

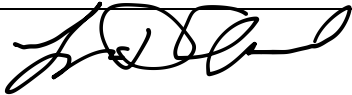
MACHUCA, GARCIA, and ROMERO are each in regular contact with other members of this fraud scheme, both known and unknown, during times in which fraudulent activity is occurring.

CONCLUSION

76. Based on the foregoing, there is probable cause to believe that the federal criminal statutes cited herein have been violated. I respectfully request that this Court issue criminal complaints and an arrest warrants for GARCIA, MACHUCA and ROMERO for violations of 18 U.S.C. § 1349, 18 U.S.C. § 1343 and 18 U.S.C. § 1028A.



Special Agent Michaela Gneco

<p>Attested to by the applicant by telephone</p> <p style="text-align: center;">August 16, 2021</p> <hr/> <p style="text-align: center;"><i>Date</i></p> <p style="text-align: center;">Providence RI</p> <hr/> <p style="text-align: center;"><i>City and State</i></p>	 <hr/> <p style="text-align: center;"><i>Judge's signature</i></p> <div style="border: 1px solid green; padding: 2px; text-align: center; margin: 5px auto; width: 150px;">Lincoln D Almond USMJ</div> <hr/> <p style="text-align: center;"><i>Printed name and title</i></p>
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